

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LHB INSURANCE BROKERAGE INC., on behalf of
itself and all others similarly situated,

Plaintiff,

v.

CITIGROUP INC. and CITIGROUP GLOBAL
MARKETS INC.,

Defendants.

Case No. 08-CV-3095 (LTS)

LISA SWANSON, Individually And On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CITIGROUP GLOBAL
MARKETS INC., and CITI SMITH BARNEY,

Defendants.

Case No. 08-CV-3139 (LTS)

SAMUEL A. STOCKHAMER and ALICE L.
STOCKHAMER, on Behalf of Themselves and All
Others Similarly Situated,

Plaintiffs,

v.

CITIGROUP INC. and CITIGROUP GLOBAL
MARKETS INC.,

Defendants.

Case No. 08-CV-3904 (LTS)

WEDGEWOOD TACOMA LLC, Individually And On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CITIGROUP GLOBAL
MARKETS INC., and CITI SMITH BARNEY,

Defendants.

Case No. 08-CV-4360 (LTS)

JUDGE LAURA T. SWAIN

**CORPORATE DISCLOSURE
STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1(a), the undersigned
counsel of record for Defendants in the above-captioned actions states as follows:

Smith Barney is a division of CGMI. Smith Barney has no separate
corporate existence, and therefore is not a corporate party to this action within the
meaning of Rule 7.1. This statement should not be construed so as to concede that Smith
Barney is a judicially recognizable entity.

CGMI is an indirect, wholly-owned subsidiary of Citigroup Global
Markets Holdings Inc., which is a wholly-owned subsidiary of Citigroup Inc.

Citigroup Inc. is a publicly-traded corporation that has no parent
corporation and no publicly held corporation owns 10% or more of its stock.

Dated: June 13, 2008
New York, New York

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Brad S. Karp

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